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ATTORNEYS FOR
SHEKINAH OILFIELD SERVICES, INC.
DEBTOR AND DEBTOR IN POSSESSION

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
ABILENE DIVISION**

IN RE:	§	
	§	CASE NO. 21-10152
SHEKINAH OILFIELD SERVICES,	§	(Chapter 11)
INC.,	§	HEARING SET: July 6, 2022, 1:30 p.m.
Debtor.	§	

OBJECTION TO SCHEDULED CLAIM OF CP INTERNATIONAL, INC.

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT GEORGE MAHON FEDERAL BUILDING, 1205 TEXAS AVE., RM 306, LUBBOCK, TX 79401-4002 BEFORE THE CLOSE OF BUSINESS ON JUNE 9, 2022, WHICH IS AT LEAST 30 DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

TO THE HONORABLE ROBERT L. JONES, U.S. BANKRUPTCY JUDGE:

Shekinah Oilfield Services, Inc., debtor and debtor in possession (the “Debtor”) files this *Objection to Scheduled Claim of CP International, Inc.* (the “Objection”) and in support thereof would show the Court the following.

INTRODUCTION

1. This Objection pertains to the claim (the “Claim”) referenced and described below.

Claimant:	CP International, Inc.
Proof of Claim No.:	Scheduled
Claim Amount Asserted:	\$321,209.22
Date filed:	n/a

2. Any claim asserted by CP International Inc. would be time barred by limitations and/or fully set off by storage charges.

JURISDICTION AND VENUE

3. The Court has jurisdiction over this action pursuant to, and without limitation §502 et seq. of the United States Bankruptcy Code, 11 U.S.C. § 101 et seq. (the “Code”).

4. Venue action is proper in this Court pursuant to 28 U.S.C. § 1409.

5. The Court may try this action to a conclusion and enter final orders under *Stern v. Marshall*, 131 S. Ct. 2594 (U.S. 2011).

FACTUAL BACKGROUND

The identify and background of the Debtor and Debtor in Possession.

6. The Debtor formerly operated an oilfield service business in New Mexico. The Debtor currently is employed full time and works as a professional engineer.

The Commencement of the Bankruptcy Cases.

7. On February 11, 2022, the Debtor commenced the above-captioned Chapter 11 case by filing a voluntary petition.

8. The Debtor commenced this case in order to address a long-standing indebtedness relating to the former business of the Debtor.

Factual background in support of the relief requested.

9. The Debtor and CP International, Inc. ("CPI") previously were the subject of a prepetition distribution agreement and/or consignment agreement whereby CPI placed certain equipment inventory with the Debtor or for sale by the Debtor and the remittance of proceeds to CPI. The Debtor in 2015 or 2016 fell behind in its remittance obligations to CPI. On or about November 15, 2015 the Debtor entered into a settlement agreement with CPI, however, the Debtor subsequently defaulted in the performance of that settlement agreement. Based upon the Petition Date, and the timing of the default(s), the Debtor believes that any applicable statute of limitations has lapsed with respect to any remaining obligations of the Debtor to CPI. The last known balance of approximately \$321,209 is unenforceable against the Debtor.

10. Meanwhile, since 2015, the Debtor has requested that CPI retrieve the remaining equipment inventory from the Debtor, and the Debtor has been unable to communicate with anyone at CPI and/or CPI has not otherwise sought to retrieve the equipment inventory. Accordingly, the equipment inventory was abandoned prior to the Petition Date by CPI and has become the property of the Debtor by the passage of time and/or the operation of law, and/or CPI has incurred storage charges with the Debtor since at least November 15, 2015 which storage charges meet or exceed, and which could be set off against, any amounts that might be owed to CPI.

RELIEF REQUESTED

11. Accordingly, pursuant to Code §502(b), the Debtor respectfully requests that the Court disallow the Claim in its entirety.

12. A proposed form of final order accompanies this Objection and is incorporated by reference herein.

BASIS OF RELIEF

13. As stated above, the Debtor has no remaining liability to CP International.

RESERVATION OF RIGHTS

14. The Debtor reserves the right to amend and/or supplement this Objection prior to any hearing.

CONCLUSION AND PRAYER

WHEREFORE, Shekinah Oilfield Services, Inc., the debtor and debtor-in-possession, respectfully requests that the Court enter an order disallowing the Claim in its entirety. Debtor respectfully requests that the Court grant to Debtor such other and further relief to which the Debtor is entitled at law or in equity.

Dated: May 10, 2022

Respectfully submitted:

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

By: /s/ Jeff Carruth
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SEKINHA OILFIELD SERVICES, INC.
DEBTOR AND DEBTOR IN POSSESSION

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing item was served on May 10, 2022 to all parties appearing in the attached service list by the means listed in such list.

In addition, the foregoing item was served by regular mail upon the following addresses for the creditor.

CP International, Inc.
10681 Haddington Drive #130
Houston, TX 77043

/s/ Jeff Carruth

JEFF CARRUTH

SERVICE LIST	Case No. 21-10152	In re: Shekinah Oilfield Services Inc.				
Creditor list download date:	10-May-22					
Address1	Address2	Address3	Address4	Address5	Comment on matrix	Method of Service
First National Bank Albany/Breckenridge					undeliverable	n/a
Lee Law Firm, PLLC	8701 Bedford Euless Rd	Hurst, TX 76053-3804				NOA-ECF
Shackelford County Appraisal District	c/o Lee Gordon	P.O. Box 1269	Round Rock, TX 78680-1269			NOA-ECF
Shekinah Oilfield Services, Inc.	PO Box 2411	Albay, TX 76430-8018				Regular mail
Weycer, Kaplan, Pulaski & Zuber, P.C.	3030 Matlock Rd	Suite	201	Arlington, TX 76015-2936		NOA-ECF
AMUR Equipment Finance, Inc.	308 N Locust Street	Grand Island, NE 68801-5985				Regular mail
CP International, Inc.	10681 Haddington Drive, Suite 130	Houston, TX 77043-3239				Regular mail
Capital One Bank (USA), N.A.	by American InfoSource as agent	PO Box 71083	Charlotte, NC 28272-1083			Regular mail
Certified Laboratories	PO Box 971269	Dallas, TX 75397-1269				Regular mail
Cintas Corporation	768 Walnut Street	Abilene, TX 79601-5228				Regular mail
Comptroller of Public Accounts	C/O Office of the Attorney General	Bankruptcy - Collections Division MC-008	PO Box 12548	Austin TX 78711-2548		Regular mail
Filtration Specialties Co.	PO Box 1619	1505 S Treadaway Blvd	Abilene, TX 79602-4926			Regular mail
Financial Pacific Leasing, Inc.	3455 S 344th Way, Ste 300	Federal Way, WA 98001-9546				Regular mail
First National Bank Albany/Breckenridge	100 South Main Street	PO Box 2019	Albany, TX 76430-8000			NOA-ECF
G&H Sales, Inc.	PO Box 668	Odessa, TX 79760-0668				Regular mail
Internal Revenue Service	PO Box 7346	Philadelphia, PA 19101-7346				Regular mail
KS Supplies, Inc.	2015 Ave C	Lubbock, TX 79404-1020				Regular mail
Kubota Credit Corp. USA	PO Box 2046	Grapevine, TX 76099-2046				Regular mail
Kubota Credit Corporation	PO Box 9013	Addison, Texas 75001-9013				Regular mail
Lufkin Industries, LLC	PO Box 301199	Dallas, TX 75303-1199				Regular mail
ROCO Machine & Supply, LTD	PO Box 3241	Albany, TX 76430-8059				Regular mail
Resist-ALL Electric, LLC	PO Box 1727	Breckenridge, TX 76424-1727				Regular mail
SOGIANT PetroEquip USA Corp.	11106 W I-20 E	Odessa, TX 79765-9444				Regular mail
Shackelford CAD	c/o Tara LeDay	P.O. Box 1269	Round Rock, Tx. 78680-1269			NOA-ECF
Sweetwater EC&M, Inc.	110 County Road 141	Sweetwater, TX 79556-4127				Regular mail
T&W Tire	PO Box 974474	Dallas, TX 75397-4474				Regular mail
TEXAS COMPTROLLER OF PUBLIC ACCOUNTS	REVENUE ACCOUNTING DIV - BANKRUPTCY SECTION	PO BOX 13528	AUSTIN TX 78711-3528		preferred	Regular mail
United States Trustee	1100 Commerce Street	Room 976	Dallas, TX 75242-0996			NOA-ECF
Western Marketing, Inc.	PO Box 677422	Dallas, TX 75267-7422				Regular mail
Zep Sales & Service	3330 Cumberland Blvd, Suite 700	Atlanta, GA 30339-8100				Regular mail
Brad W. Odell -SBRA V	Mullin Hoard & Brown, L.L.P.	P.O. Box 2585	Lubbock, TX 79408-2585			NOA-ECF
Jeffery D. Carruth	Weycer, Kaplan, Pulaski & Zuber, P.C.	3030 Matlock Rd., Suite 201	Arlington, TX 76015-2936			NOA-ECF

PROPOSED FINAL ORDER

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
ABILENE DIVISION**

IN RE:	§	
	§	CASE NO. 21-10152-rlj11V
SHEKINAH OILFIELD SERVICES,	§	
INC.,	§	
Debtor.	§	

**ORDER SUSTAINING OBJECTION TO SCHEDULED CLAIM OF CP
INTERNATIONAL, INC.(RE: DOCKET NO. ###)**

On this day came on for consideration the *Objection to Scheduled Claim of CP International, Inc.* (Docket No. ###) (the “Objection”) filed herein on May 10, 2022 by Shekinah Oilfields Services, Inc., debtor and debtor in possession (the “Debtor”), regarding the scheduled claim referenced and described below (the “Claim”).

Claimant:	CP International, Inc.
Proof of Claim No.:	Scheduled
Claim Amount Asserted:	\$321,209.22
Date filed:	n/a

The Court finds and concludes that upon review of the record of this case that sufficient notice was provided in accordance with the Federal Rules of Bankruptcy Procedures and/or the Local Bankruptcy Rules and with respect to the Motion that cause exists to grant the relief requested therein. No response or request for hearing relating to the Objection was filed.

IT IS THEREFORE ORDERED THAT:

1. The Objection is granted as set forth herein.
2. All capitalized terms shall have the same meaning as ascribed to such terms in the Motion, unless otherwise defined herein.
3. The Claim is disallowed in its entirety.
4. The Claim is entitled to no distribution by the bankruptcy estate of the Debtor and/or by the Debtor with respect to any Chapter 11 plan.
5. The Debtor promptly shall serve a copy of this order upon the claimant and file a certificate of service with the Court.

END OF ORDER

Submitted by:

Jeff Carruth (TX SBN: 24001846)
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